

Defendant's Exhibit 72

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

CONFIDENTIAL - PURSUANT TO THE PROTECTIVE ORDER

ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)
CORPORATE REPRESENTATIVE - ISABELLA LEONE
(Reported Remotely via Video & Web Videoconference)
Seattle, Washington (Deponent's location)
Friday, August 5, 2022

STENOGRAPHICALLY REPORTED BY:

REBECCA L. ROMANO, RPR, CSR, CCR

California CSR No. 12546

Nevada CCR No. 827

Oregon CSR No. 20-0466

Washington CCR No. 349

JOB NO. 5345580

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1 Q. (By Ms. Weaver) No, that's fair. That's 08:08:51
2 fine.
3 Just trying to understand -- you actually
4 yourself created the document; is that right?
5 A. Yes. 08:08:57
6 Q. Okay. And when you -- you wrote
7 "Approximately 36 hours with counsel."
8 Do you see that?
9 A. Yes.
10 Q. Which counsel are you referring to? 08:09:09
11 A. Gibson Dunn. So Matt Benjamin and the
12 broader team.
13 Q. And who else other than Mr. Benjamin?
14 A. Martie Phuntso. Matt -- Matt Buongiorno,
15 the other Matt. Rose Ring and Naima Farrell. 08:09:23
16 Q. Okay. And anyone else?
17 A. I don't believe so from the Gibson Dunn
18 team. And then Ian Chen, our -- my -- the -- the
19 Meta lawyer who's also on the call.
20 Q. Okay. Did you meet with any other 08:09:42
21 lawyers during those 36 hours?
22 A. No.
23 Q. Okay. Did you meet with any lawyers to
24 prepare at all?
25 A. No, not aside from these lawyers. 08:09:53

1 Q. Okay. Sometimes I'm asking you questions 08:09:56
2 and it may seem curious to you. But again, we're
3 laying foundation for a record that I'm just trying
4 to make sure that I'm not missing something.

5 When did you meet with counsel during 08:10:08
6 those 36 hours?

7 A. Those have been divided up over multiple
8 weeks. I think originally, towards the end of May,
9 and then sessions over time that varied between an
10 hour and three to four hours long. And I don't 08:10:23
11 remember the exact number of sessions.

12 Q. And during those sessions, did counsel
13 provide you with documents?

14 A. We discussed the documents for this
15 deposition. And then as well as documents from my 08:10:37
16 prep, whether that was external -- Facebook
17 documents or documents that -- that we worked
18 through about the products or anything relevant.

19 Q. And when you say "the external," what did
20 you mean? 08:10:54

21 A. Sorry. I mean, articles such as like our
22 help center or our news blog posts, areas where
23 we've discussed our targeting and ranking
24 externally. And then as well as our internal
25 references about those products as well. 08:11:08

1 Q. And when you say "internal references," 08:11:10

2 what are you referring to?

3 A. For example -- I'm trying to think of a
4 good example that makes sense.

5 I -- I'm -- I can double-check. I think 08:11:30

6 we used an internal wiki, which is kind of like our
7 version of how we -- how -- how our internal, like
8 way of documenting for teams to reference.

9 And similar if -- if any internal
10 announcements that were relevant. So I -- I 08:11:49
11 believe looking at like an internal announcement
12 that helps us get our sales teams in -- prepared
13 for an external announcement. So that's the --
14 that's an example of -- of an internal document
15 that I looked at. 08:12:04

16 Q. Got it.

17 And for the internal documents, did you
18 provide those to counsel to discuss or did they
19 provide them to you?

20 MR. BENJAMIN: Objection to form. 08:12:14

21 MS. WEAVER: Let me ask differently.

22 Q. (By Ms. Weaver) Did you provide any of
23 those internal documents to prepare for your
24 deposition?

25 MR. BENJAMIN: Objection. Form. 08:12:23

1 THE DEPONENT: I'm -- did I provide them 08:12:26
2 to my counsel or in our conversations, or look at
3 them during those sessions?
4 I'm not totally sure what you mean.
5 Q. (By Ms. Weaver) Did -- did you yourself 08:12:35
6 identify any internal documents that you used to
7 prepare for this deposition?
8 A. Without anyone else? No, I -- I don't
9 think so.
10 Q. Okay. So the materials that you used to 08:12:48
11 prepare were largely, if not exclusively, curated
12 by the attorneys; is that right?
13 MR. BENJAMIN: Objection to form.
14 Misstates.
15 THE DEPONENT: I -- they weren't 08:13:06
16 exclusively from the legal team. They could have
17 been from the groups and the people we also worked
18 on with my prep, our employees that aren't lawyers.
19 Q. (By Ms. Weaver) And did you provide any
20 documents to prepare? 08:13:19
21 MR. BENJAMIN: Objection. Form.
22 THE DEPONENT: I -- I don't believe I
23 did, no.
24 Q. (By Ms. Weaver) And how many documents
25 did the team that you met with provide? 08:13:28

1 A. The legal team or when -- 08:13:34
2 (Simultaneously speaking.)
3 Q. (By Ms. Weaver) The nonlegal --
4 A. The nonlegal team --
5 Q. Sorry. 08:13:39
6 A. Go ahead.
7 Q. That's my fault. I apologize.
8 How many documents did the nonlegal team
9 identify and provide for you to use in preparation
10 for this deposition? 08:13:51
11 MR. BENJAMIN: Objection. Form. Vague.
12 THE DEPONENT: I -- I think -- I can
13 think of like one document that -- that one of
14 the -- one of the people I was speaking to
15 referenced, and then I looked for that document. 08:14:08
16 Q. (By Ms. Weaver) And what document was
17 that?
18 A. It was one of the sales announcements
19 that I referenced ahead of an external
20 announcement. 08:14:17
21 Q. And did you find it useful in terms of
22 preparing for your deposition?
23 A. Not particularly, to be honest.
24 Q. And why is that?
25 A. It didn't have -- it -- it didn't really 08:14:28

1 give me the information I was looking for. 08:14:31

2 Q. Okay. And what was the information you
3 were looking for?

4 A. I was trying to understand what was an
5 update we made in our targeting tools and it didn't 08:14:39
6 actually describe it particularly in detail. So it
7 was not a very ref- -- helpful reference.

8 Q. Got it.

9 And what year was the update that you
10 were thinking of? 08:14:53

11 A. It was --

12 MR. BENJAMIN: Objection to form.

13 THE DEPONENT: Sorry.

14 MR. BENJAMIN: Sorry, Isabella.

15 Objection. Form. 08:15:02

16 THE DEPONENT: It was 20- -- 2013 or
17 2014.

18 Q. (By Ms. Weaver) And did you find the
19 answer that you were looking for with regard to
20 this update in 2013 and 2014? 08:15:16

21 A. Yes, I did.

22 MR. BENJAMIN: Objection.

23 Q. (By Ms. Weaver) And -- and what was the
24 issue, if you don't mind explaining?

25 A. Yeah, absolutely. 08:15:26

1 We had -- it was actually related to one 08:15:27
2 of the documents you -- you -- that's -- that was
3 part of the deposition, the exhibits. It was
4 related to the -- the removal of our reach
5 estimates. 08:15:40

6 Q. Okay. We'll return to that in a bit
7 because I think what I want to do is try to be a
8 little more methodical and talk about definitions,
9 et cetera.

10 Returning back to Exhibit 1 for just a 08:15:53
11 moment, you said -- you wrote here that you spent
12 eight hours preparing on your own; is that right?

13 A. Yes.

14 Q. What did you do to prepare on your own?

15 A. I largely reread the documents that were 08:16:05
16 submitted, and then read the -- the -- the
17 documents that the legal team had put together as
18 well.

19 Q. Okay. And when you wrote, "documents
20 from Plaintiffs," did you mean the documents that 08:16:18
21 we identified for the deposition?

22 A. (Deponent nods head.)

23 Q. Okay.

24 A. Those as well as just the -- I -- I'm not
25 sure if it make a difference, but the ones 08:16:30